

U.S. Department of Justice

United States Attorney District of Maryland

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November 12, 2021

The Honorable Catherine C. Blake United States District Court for the District of Maryland Garmatz Federal Courthouse 101 West Lombard Street Baltimore, Maryland 21201

Re: United States v. Farace et al.,

Criminal No. CCB-21-294

Dear Judge Blake:

I write regarding the status of the above-captioned case. The two defendants in this case, Ryan Farace ("R. Farace") and Joseph Farace ("J. Farace"), have each been charged in a one-count indictment charging them with conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h). The defendants had their initial appearances, and J. Farace his arraignment, on October 8 and October 6, respectively.

The parties thereafter met and conferred regarding discovery as required by Rule 16.1, and the government made its initial discovery production. Discovery remains ongoing as there are several electronic devices still being imaged and copied. Due to the ongoing discovery and the schedules of counsel in this matter, the parties respectfully submit that a further status report in this matter due in 45 days would be appropriate. The parties have further agreed, for similar reasons, to toll the Speedy Trial Clock during this period, and will file a motion seeking this Court's approval in this regard forthwith.

cc: Gerry Ruter, Esq. (via ECF)
David Little-Washington, Esq. (via ECF)